

FY22 Summary of the Brownfield Assessment, Revolving Loan Fund, and Cleanup Grant Guidelines Changes
(as of 10/6/21)

EPA prepared this Summary of Changes document to assist prospective applicants with preparing Brownfields Assessment, Revolving Loan Fund (RLF), and Cleanup Grant applications. **Please review the FY22 Application Guidelines** (also referred to as Request for Application (RFA) or the solicitation) **when preparing your application**. If the information in the Summary of Changes differs from information in the statute, regulation, or the Guidelines, then the statute, regulation, or the Guidelines will take precedence.

A solicitation for new **Assessment Coalition Grants** will not be available in FY22. Entities applying for a Community-wide Assessment Grant that have flexible local laws to conduct assessments beyond their jurisdictional boundaries can formally partner with other eligible entities through a Memorandum of Agreement (similar to a partnership under the Assessment Coalition model) to expand the community-wide assessment scope of work beyond the applicant's boundaries and ensure site access.

New in FY22: Community-wide Assessment Grants for States and Tribes – Eligible entities include states, tribes, and eligible native corporations in Alaska. See the Assessment Grant Guidelines for additional information.

Revolving Loan Fund Grant Applicants – Only eligible entities who do not have or are not part of (i.e., a coalition member) an open cooperative agreement for a Brownfields RLF at the time of application may apply for funding in the FY22 competition.

RLF Grant recipients with an open cooperative agreement may request supplemental funding in early 2022. Additional information on the timing, requirements, and procedures for supplemental funding requests will be posted on [EPA's Brownfields Program website](#) at a later date.

Applicants may apply for Cleanup Grant **or** an RLF Grant in the same competition year.

A solicitation for new **Multipurpose Grants** will not be available in FY22. EPA expects to solicit requests for Multipurpose Grant funding in FY23.

CHANGES TO THE ASSESSMENT, REVOLVING LOAN FUND (RLF), AND CLEANUP GRANT GUIDELINES		
Topic	Previously Published Guidelines	FY22 Assessment, RLF, and Cleanup Grant Guidelines
General Information		
Current Multipurpose Grant Recipients	Current EPA Brownfields Multipurpose Grant recipients were not eligible to apply for additional funding.	Entities that were previously awarded an EPA Brownfields Multipurpose Grant that would like to apply for an FY22 Community-wide Assessment Grant, Site-specific Assessment Grant, RLF Grant, or Cleanup Grant must demonstrate that payment has been received from EPA (also known as 'drawn down'), and drawn down funds have

		been disbursed, for at least 70.00% of the funding for the Multipurpose cooperative agreement by October 1, 2021 .
Current Assessment Grant Recipients	Current EPA Brownfields Assessment Grant recipients must demonstrate that payment has been received from EPA (also known as ‘drawn down’) for at least 70% of the funding of each Assessment cooperative agreement they have with EPA by October 1, 2020, in order to apply for additional Assessment Grant funding under this solicitation.	<i>Community-wide and Site-specific Assessment Grant applicants:</i> Current EPA Brownfields Assessment Grant recipients must demonstrate that payment has been received from EPA (also known as ‘drawn down’), and drawn down funds have been disbursed, for at least 70.00% of the funding for each Assessment cooperative agreement they have with EPA by October 1, 2021 , in order to apply for additional Assessment Grant funding under this solicitation. [This requirement does not apply to entities applying for an FY22 Community-wide Assessment Grant for States and Tribes.]
Narrative Information Sheet	The information included in the Narrative Information Sheet was limited to 2 pages, single-spaced.	The information included in the Narrative Information Sheet is limited to 3 pages, single-spaced.
		Clarified that applicants may not include a project summary or overview in the Narrative Information Sheet.
		Community-wide Assessment Grant and RLF Grant applicants, other than tribal governments, are requested to list the target area(s). For each target area that is smaller than a city/town, list the census tract number(s) within the target areas, and provide the address of the priority site(s) proposed in the Narrative.
Making Applications Publicly Available		Copies of applications may be made publicly available on the Office of Brownfields and Land Revitalization’s website or another public website for a period of time <u>after the selected applications are announced</u> . EPA recommends that applications not include trade secrets or commercial or financial information that is confidential or privileged, or sensitive information, if disclosed, that would invade another individual’s personal privacy (e.g., an individual’s salary, personal email addresses, etc.). However, if such information is included, it will be treated in accordance with 40 CFR 2.203.

Responding to the Criteria in the Narrative	<p>“The Narrative must include clear, concise, and factual responses to all ranking criteria and sub-criteria below. A response to a criterion/sub-criterion that is included in a different section of the Narrative may not be scored as favorably. The Narrative must provide sufficient detail to allow for an evaluation of the merits of the application. If a criterion does not apply, clearly state this. Any criterion left unanswered may result in zero points given for that criterion. Responses to the criteria should include the criteria number and title but need not restate the entire text of the criteria.”</p>	<p>EPA encourages applicants to respond to the criteria in the order in which they appear in the Guidelines.</p> <p>“The Narrative must include clear, concise, and factual responses to all ranking criteria and sub-criteria below. A response to a criterion/sub-criterion that is included in a different section of the Narrative may not be scored as favorably. The Narrative must provide sufficient detail to allow for an evaluation of the merits of the application. If a criterion does not apply, clearly state this. Any criterion left unanswered may result in zero points given for that criterion. Responses to the criteria should include the criteria number and title but need not restate the entire text of the criteria.”</p>
Negotiated Indirect Cost Rate Agreements		<p>For applications that include indirect costs in the budget and are selected for funding, an EPA Grants Specialist or Grants Management Officer may request a copy of the indirect cost rate agreement that was negotiated with the cognizant agency before the cooperative agreement is awarded.</p>
EJScreen Tool		<p>Applicants are encouraged, but not required, to include data from EPA's EJSCREEN Tool (or other EJ-focused geospatial mapping tools) in the Narrative to help characterize and describe the target area(s) and its community(ies)/population(s). Data from other sources (e.g., studies, census, and third-party reports) can also be included to give a more complete picture of the impacted communities and populations.</p>
5% Administrative Cap		<p>Clarified that Cleanup and RLF Grant applications that include direct and/or indirect administrative costs cannot exceed 5% of the total award amount (EPA grant funds plus the recipient’s cost share).</p> <p>For example, a \$100,000 EPA grant + \$20,000 (20%) recipient cost share = a \$120,000 total award. Therefore, the 5% cap is based on the \$120,000 total award amount and equals \$6,000.</p>

		Administrative costs that exceed 5% of the total award (for all grant types) will be evaluated less favorably.
III. Eligibility Information and Threshold Criteria		
Number of Applications per Applicant	Applicants that exceed the number and type of applications allowable will be contacted, prior to review of any of the applications by EPA, to determine which application(s) the applicant will withdraw from the competition.	Clarified guidance on how what organization is considered ‘the applicant’: “Applicants that exceed the number and type of applications allowable will be contacted, prior to review of any of the applications by EPA, to determine which application(s) the applicant will withdraw from the competition. EPA considers departments, agencies, or instrumentalities of the same state, tribal, or city governments to be the same applicant if they are supervised or controlled by the same elected/appointed executives (even if they have different unique entity identifiers, e.g., DUNS number). For example, a corporation formed under state or local law to perform redevelopment activities on behalf of or in support of a local government that is primarily staffed by employees of that local government will be considered an agency of instrumentality of that local government for the purposes of this threshold criterion.”
Named Contractors and Subrecipients		New threshold criterion: EPA does not require or encourage applicants to name procurement contractors (including consultants) or subrecipients (such as units of government or nonprofit organizations but not for-profit firms) in applications for brownfields cooperative agreements. However, if an applicant chooses to identify a procurement contractor(s) or subrecipient(s) to conduct work proposed in its application, the applicant must comply with the requirements outlined in the threshold criterion even if the entity is referred to as a “partner” in the application. Failure to demonstrate that a procurement contractor was selected in compliance with applicable competition requirements or that a subrecipient is eligible for a subaward will result in rejection of the application.

IV.E. Ranking Criteria & V.A. Evaluation Criteria		
1.b.ii. – Outcomes and Benefits of Reuse Strategy	Included language for applicants to provide information on how the outcomes of the overall plan for revitalization will benefit efforts within an Opportunity Zone, and if applicable, how the proposed project or revitalization plans will promote the sustainable reuse of existing buildings or structures.	<p>Removed language for applicants to provide information on how the outcomes of the overall plan for revitalization will benefit efforts within an Opportunity Zone and how the proposed project or revitalization plans will promote the sustainable reuse of existing buildings or structures.</p> <p>Added a criterion that requests applicants to provide information on if/how the proposed project or revitalization plans will benefit a disadvantaged community.</p>
2.b.ii.(3) Promoting Environmental Justice	<u>(3) Disproportionately Impacted Populations</u> The extent to which this grant will address or facilitate the identification and reduction of threats to populations in the <u>target area(s)</u> that have environmental justice challenges and/or disproportionately share the negative environmental consequences resulting from industrial, governmental and/or commercial operations or policies.	<u>(3) Promoting Environmental Justice</u> The extent to which this grant and reuse strategy/projected site reuse(s) will promote environmental justice in the target area(s) and/or will support populations in the target area(s) that disproportionately share the negative environmental consequences resulting from industrial, governmental and/or commercial operations or policies.
3. Cost Estimates	Describe how cost estimates for each task were developed (per budget category), and, where appropriate, present costs per unit.	Provide information on how cost estimates for each task were developed (per budget category, including direct administrative costs (if applicable), and indirect administrative costs (if applicable)), and, where appropriate, present costs per unit. Note, the total amount of direct and indirect administrative costs cannot exceed 5% of the total award amount.
V.B. Other Factors and Considerations		<p>Removed:</p> <ul style="list-style-type: none"> Whether the applicant’s project is located in an IRS-designated Opportunity Zone. <p>Added:</p> <ul style="list-style-type: none"> whether the target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing; and

		<ul style="list-style-type: none"> whether the target area(s) is located within, or includes, a census tract in which 20% or more of the population lives below the national poverty level as measured by the 2019 American Community Survey (ACS) 5-year estimates from the United States Census Bureau.
ASSESSMENT GRANT GUIDELINE CHANGES		
Topic	FY21 Assessment Grant Guidelines	FY22 Assessment Grant Guidelines
General Information		
Community-wide Assessments – Award Information	<ul style="list-style-type: none"> Awards were available up to \$300,000 	<ul style="list-style-type: none"> Awards are available up to \$500,000
Community-wide Assessment Grants for States/Tribes – Award Information		<ul style="list-style-type: none"> Awards are available up to \$2,000,000 Period of performance is up to 5 years
Community-wide Assessment Grants for States/Tribes – Narrative Page Limit		<p>The narrative is limited to 12-pages, single-spaced for Community-wide Assessment Grant Applications for States and Tribes.</p> <p>Note, applications for Community-wide and Site-specific Assessment Grant funding are limited to 10-pages, single-spaced.</p>
III. Eligibility Information and Threshold Criteria		
III.A. Community-wide Assessment Grants for States/Tribes – Who Can Apply?		<p>Only the following entities are eligible to apply for a Community-wide Assessment Grant for States and Tribes:</p> <ul style="list-style-type: none"> states (i.e., state agencies that are subject to the direct control of the governor or other elected executive officials such as environmental agencies, transportation agencies, health departments, parks and recreation departments, and departments of commerce); and tribes (i.e., Indian tribe other than in Alaska, and Intertribal Consortia comprised of eligible Indian tribes, Alaska Native Regional Corporation, Alaska Native Village Corporation, and Metlakatla Indian Community).

		<p>Note, state and tribal universities and colleges are not eligible for funding.</p> <p>EPA will only accept one application per eligible state agency and one application per tribe. Note, if EPA receives more than one application per state (regardless if the applications are submitted by different eligible state agencies), EPA will only select the highest-ranking application that qualifies for selection.</p>
III.D.1. Community-wide Assessment Grants for States/Tribes – Target Areas		<p>Applicants must propose at least three target areas and five priority sites, including at least one priority site in each target area, in the Narrative. Applicants will address this threshold criterion by providing a response to Section IV.D.4. in the Narrative Information Sheet.</p> <p>Note, if the application is selected for funding, the target areas and priority sites discussed in the Narrative will be incorporated into the workplan that is negotiated with EPA. Recipients must assess a minimum of 10 sites; therefore, additional priority sites may be selected throughout the period of performance.</p>
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
1.a.i. Background and Description of Target Area – Community-wide Assessment Grants for States/Tribes		<p>Added criterion:</p> <ul style="list-style-type: none"> • Additionally, a Community-wide Assessment Grant Application for States and Tribes will be evaluated on the extent to which <u>at least three</u> specific target areas where assessment activities will be performed are clearly defined within the identified city(ies), town(s), or geographic area(s). <ul style="list-style-type: none"> ○ Further, an application from a State entity will be evaluated on the extent to which at least one target area is in a metropolitan statistical area and at least one target area is in a non-metropolitan statistical area. <i>(Note, a response will be evaluated less favorably if all of the target areas are in metropolitan statistical areas or if all of the target areas are in non-metropolitan statistical areas.)</i>

1.a.ii. Description of the Priority Brownfield Site(s) – Community-wide Assessment Grants for States/Tribes		Added criterion: <i>Community-wide Assessment Grant Applications for States and Tribes</i> will be evaluated on the extent to which the response provides a clear overview of the brownfield sites in the target areas. The degree to which at least five sites are highlighted as a priority and the degree to which the priority sites are clearly described, including at least one site in each target area. The degree to which it is clear why the sites identified as a priority for assessment and reuse has been selected. <i>(Note, applicants that do not discuss at least one priority site in each target area or do not discuss at least five priority sites will be evaluated less favorably.)</i>
2.a.i. The Community's Need for Funding – Community-wide Assessment Grants for States/Tribes		Added criterion: For <i>Community-wide Assessment Grant Applications for States and Tribes, State applicants only</i> , will be evaluated on the extent to which this funding will serve communities that do not have the capacity to apply for and manage their own Brownfields Grant and would otherwise not have access to Brownfield Grant resources to address brownfield sites.
2.b.i. Project Involvement – Community-wide Assessment Grants for States/Tribes		Added criterion: Additionally, <i>a Community-wide Assessment Grant Application for States and Tribes</i> will be evaluated on the extent to which the applicant has a sound plan to identify and engage local organizations/entities/groups to be involved in the project as additional target areas and priority sites are identified throughout the period of performance.
3.a.i.(1) Identifying Additional Target Areas/Sites – Community-wide Assessment Grants for States and Tribes		Added criterion: <i>Community-wide Assessment Grant Applications for States and Tribes</i> will be evaluated on the degree to which there is a clear plan to identify additional target areas/sites for assessment and the degree to which the criteria that will be used to prioritize sites for

		<p>selection considers target areas/sites throughout the applicant's jurisdiction and target areas with disadvantaged communities.</p> <ul style="list-style-type: none"> Additionally for State applicants only, the extent to which target areas with disadvantaged communities include metropolitan <u>and</u> non-metropolitan statistical areas.
3.b.ii. Application of Cost Estimates	Assessment Grant projects that allocated at least 50% of the funds for tasks directly associated with Phase I and Phase II environmental site assessments were reviewed more favorably.	<i>Assessment Grant projects</i> that allocate at least 60% of the funds to tasks directly associated with site-specific work (i.e., Phase I and Phase II environmental site assessments and site-specific cleanup) will be evaluated more favorably.
4.a.i. Organizational Capacity		<p>Added criterion:</p> <p>The degree to which the applicant's organization has the capacity to carry out the programmatic, administrative, and financial requirements to successfully manage the project and grant.</p>
4.b.i.(2) Compliance with Grant Requirements		<p>Added criterion:</p> <p>All applicants that are current/past recipients of an Assessment Grant will be evaluated on the extent to which at least 50% of the most recent Assessment Grant funds were spent on direct assessment tasks/activities (i.e., Phase I and Phase II environmental site assessments).</p>
Point/Percentage Distribution		
Maximum Available Points and Distribution – Community-wide and Site-specific Applications	<p>Project Area Description and Plan for Revitalization – 28%</p> <p>Community Need and Community Engagement – 22%</p> <p>Task Description, Cost Estimates, and Measuring Success – 31%</p> <p>Programmatic Capability – 19%</p> <p>Maximum number of points: 160</p>	<p>Project Area Description and Plan for Revitalization – 25%</p> <p>Community Need and Community Engagement – 25%</p> <p>Task Description, Cost Estimates, and Measuring Success – 28%</p> <p>Programmatic Capability – 22%</p> <p>Maximum number of points: 160</p>
Maximum Available Points and Distribution – Community-wide Assessment Grants for States and Tribes	<p>Project Area Description and Plan for Revitalization – 28%</p> <p>Community Need and Community Engagement – 22%</p> <p>Task Description, Cost Estimates, and Measuring Success – 31%</p> <p>Programmatic Capability – 19%</p> <p>Maximum number of points: 160</p>	<p>Project Area Description and Plan for Revitalization – 26%</p> <p>Community Need and Community Engagement – 26%</p> <p>Task Description, Cost Estimates, and Measuring Success – 28%</p> <p>Programmatic Capability – 20%</p> <p>Maximum number of points: 175</p>

CLEANUP GRANT GUIDELINE CHANGES		
Topic	FY21 Cleanup Grant Guidelines	FY22 Cleanup Grant Guidelines
General Information		
FY22 Grant Applicants		Entities applying for an FY22 Cleanup Grant may not apply for an FY22 Revolving Loan Fund Grant (EPA-OLEM-OBLR-21-05).
III. Eligibility Information and Threshold Criteria		
III.B.15. Waiver of the \$500,000 Limit		Applicants that plan to only address <u>one</u> brownfield site in their application may request a waiver of the \$500,000 limit and request up to \$650,000 based on the anticipated level of contamination, size, and other considerations outlined in Section III.B.15. of the Cleanup Grant guidelines. Applicants requesting a waiver must attach a justification for the waiver request, up to two pages. EPA will consider requests on a case-by-case basis and intends to approve such requests on an extremely limited basis.
Point/Percentage Distribution		
Listed in Section V. within the Evaluation Criterion	Project Area Description and Plan for Revitalization – 25% Community Need and Community Engagement – 20% Task Description, Cost Estimates, and Measuring Success – 34% Programmatic Capability – 17% Maximum number of points: 175	Project Area Description and Plan for Revitalization – 28% Community Need and Community Engagement – 22% Task Description, Cost Estimates, and Measuring Success – 33% Programmatic Capability – 17% Maximum number of points: 180
REVOLVING LOAN FUND (RLF) GRANT GUIDELINE CHANGES		
Topic	FY20 RLF Grant Guidelines	FY22 RLF Grant Guidelines
General Information		
FY22 Grant Applicants		Entities applying for an FY22 RLF Grant may not apply for an FY22 Cleanup Grant (EPA-OLEM-OBLR-21-06).
III. Eligibility Information and Threshold Criteria		
III.B.2. Demonstration of Previous RLF Grant Status		New threshold criterion: “Entities with an open cooperative agreement for a Brownfields RLF are not eligible to apply for funding under this solicitation. If the applicant has previously been either a recipient of a Brownfields RLF cooperative agreement or a non-recipient member of a coalition that

		obtained RLF funding, provide the grant number and closeout date for the RLF cooperative agreement(s). Alternatively, affirm that the applicant has not had, or been a part of, a cooperative agreement for a Brownfields RLF in the past.”
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
Ranking and Evaluation Criteria – Structure		Ranking and evaluation criteria have been rewritten and/or restructured to align with the format of the FY22 Assessment and Cleanup Grant Guidelines. Please review the FY22 RLF Grant Guidelines for details.
3.a.iii. Marketing Strategy	<p>Language in the FY20 RLF Grant guidelines:</p> <p>“The degree to which the program’s market strategy identifies potential applicants and projects. The extent to which the applicant has already gauged interest or marketed the program and will continue to market the program to reach potential borrowers/subgrantees.”</p>	<p>Language is revised to place more emphasis on applicants that have already received expressed interest for a loan or subgrant.</p> <p>“The degree to which the program’s market strategy identifies potential applicants and projects. The extent to which a potential borrower or subgrantee has expressed interest in a loan or subgrant for the priority brownfield site(s), and the applicant shows how it will market the program to reach other potential borrowers/subgrantees. <i>(Projects that have interest from borrowers or subgrantees will be reviewed more favorably.)</i>”</p>
Point/Percentage Distribution		
Listed in Section V. within the Evaluation Criterion	<p>Project Area Description and Plan for Revitalization – 24%</p> <p>Community Need and Community Engagement – 19%</p> <p>Task Description, Cost Estimates, and Measuring Success – 41%</p> <p>Programmatic Capability – 16%</p> <p>Maximum number of points: 185</p>	<p>Project Area Description and Plan for Revitalization – 24%</p> <p>Community Need and Community Engagement – 21%</p> <p>Task Description, Cost Estimates, and Measuring Success – 37%</p> <p>Programmatic Capability – 18%</p> <p>Maximum number of points: 190</p>